

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed November 6, 2008. Claims 1-21 were pending in this application. This Amendment amends claims 1, 5, 8, 12, 15, and 19. Claims 4, 11, and 18 are canceled herein, leaving claims 1-3, 5-10, 12-17, and 19-21 currently pending. Reconsideration of the rejected claims is respectfully requested.

#### **I. Rejection Under 35 U.S.C. §112, Second Paragraph**

Claims 1-21 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Office Action recites that the claim feature “the Internet” of claims 1, 8, and 15 lacks antecedent basis.

Applicants respectfully submit that the claims as amended are sufficiently definite. Therefore, the Applicants respectfully request the rejection to be withdrawn.

#### **II. Rejection under 35 USC § 103, Moore et al. in view of Alumbaugh et al.**

Claims 1-5, 8-12 and 15-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Moore et al. (US Publication 2001004967) (hereinafter “Moore”) in view of Alumbaugh et al. (US Patent 6,442,592) (hereinafter “Alumbaugh”). Applicants traverse the rejections.

Applicants submit that claim 1 is not rendered obvious by a combination of Moore and Alumbaugh.

For example, Applicants' claim 1 recites: A method of updating Web pages of an e-commerce storefront, the method comprising:

accessing, on a web browser, a Web page out of a plurality of Web pages of an e-commerce Web site over an intranet link;  
submitting log in information to the Web site over the intranet link, wherein said log in information is for providing privileges sufficient to enable editing of the Web site, and wherein said intranet link is separate from an Internet communication link;

invoking a web page editor having a graphical user interface for editing the Web page, wherein the web page editor is invoked on the web browser over the intranet link;  
selecting an item on the Web page to modify;  
editing the item on the Web page using the graphical user interface to create an updated version of the Web page;  
submitting the edited item to the Web site;  
receiving the updated version of the Web page over the Internet communication link; and  
displaying the updated version of the Web page on the web browser. (emphasis added).

As recited above, claim 1 specifically recites “invoking a web page editor having a graphical user interface for editing the Web page, wherein the web page editor is invoked on the web browser over the intranet link,” “editing the item on the Web page using the graphical user interface to create an updated version of the Web page,” “receiving the updated version of the Web page over the Internet communication link,” and “displaying the updated version of the Web page on the web browser.” Applicants submit that at least these features recited in claim 1 are not disclosed or suggested by Moore, either alone or in combination with Alumbaugh.

The Office Action asserts that Moore discloses a web page editor that allows the merchant to preview the modified pages of the web site, citing to Moore paragraph [0093]. (Office Action, p. 4). The Office Action recognizes that Moore does not disclose submitting login information over an intranet link. (Office Action, p. 4).

Moore describes that an e-commerce web site can be designed using a development application. (Moore, Abstract). In particular, Moore describes that

The Tool, as either an applet which would run on top of a browser or as an application, would be downloaded from a Store Builder Server. Referring to FIG. 4, there is shown a distributed electronic commerce system 400 with a Store Builder Server 402. The merchant could download the Java wizard applet to build the pages for the Web storefront, which will reside on the Store Server 204. The Store Builder Server 402 would also contain Java servlets that would receive the HTML from the wizard applet for the storefront pages that the merchant designed and would build the store pages from this HTML. This, of course, would happen when the merchant initially designed the pages, or whenever the merchant updated or modified them. The servlet, on the Store Builder Server 402, would then publish the Web storefront pages wherever the merchant designates. (Moore, [0045]). (emphasis added).

Each page created by the merchant can, as mentioned earlier, be modified. Style components can be added, deleted, moved, resized, etc. Another feature of the Development Tool is that it presents the page just as a Web customer will see it. This feature, called WYSIWYG for “what you see is what you get” allows the merchant to see, without publishing and browsing, what the published page will look like when it is published. Additionally, the Development Tool also provides a previewing option which uploads all of the pages and allows the merchant to view the entire Web site with a Web browser. (Moore, [0093]). (emphasis added).

Applicants submit that Moore fails to disclose or suggest a GUI invoked on a web browser over an intranet link, making edits to a web page through the GUI over the intranet link, and displaying the updated web page over an Internet link, on the same browser where the edits were made. Moore does not make any mention of intranets at all. Moore only makes mention of Internets. Moore's description of the preview option to view the web pages makes no mention of the use of two links to accomplish different functions— editing web pages through a first link (i.e., intranet link) and displaying the edited web pages through a second link (i.e., Internet link). Moore merely describes that the web pages are edited using an applet over the Internet (Moore, [0084]), and previewing the web pages over the Internet.

Nor does Moore disclose that the different functions can be performed over the first link (i.e., intranet link) and the second link (i.e., Internet) through the same web browser. Moore merely describes that an applet of the Development Tool (i.e., editing tool) runs on top of a web browser. (Moore, [0084]). Moore also describes that a user can preview the web site through a browser. There is no mention that the same browser that is running the editing tool can also provide the preview. As such, Moore fails to disclose or suggest “invoking a web page editor having a graphical user interface for editing the Web page, wherein the web page editor is invoked on the web browser over the intranet link,” “editing the item on the Web page using the graphical user interface to create an updated version of the Web page,” “receiving the updated version of the Web page over the Internet communication link,” and “displaying the updated version of the Web page on the web browser.”

The Office Action relies on Alumbaugh for teaching that log in information is submitted over an intranet link. (Office Action, p. 2, item 2).

Alumbaugh describes a message center server which retrieves and distributes email messages. (Alumbaugh, Abstract). In particular, Alumbaugh describes that

Message center 102 retrieves messages from e-mail accounts 106a-106n and intelligently distributes them among a plurality of users within intranet 110. As used herein, the term “intranet” refers to infrastructure of the Internet 104 which is utilized for the purposes of a specific enterprise. Thus, users within intranet 110 may connect to message center server 102 by logging on from a workstation 112a connected through Internet 104. (Alumbaugh, col. 3, lines 31-39). (emphasis added).

Applicants submit that Alumbaugh fails to disclose or suggest a GUI invoked on a web browser over an intranet link, making edits to a web page through the GUI over the intranet

link, and displaying the updated web page over an Internet link, on the same browser where the edits were made. Alumbaugh merely describes that users within an intranet can connect to the message center to retrieve their email messages. There is no mention or suggestion of the use of two links to accomplish different functions— editing web pages through a first link (i.e., intranet link) and displaying the edited web pages through a second link (i.e., Internet link), through the same web browser. Accordingly, Applicants submit that the features recited in claim 1 are not disclosed or suggested by Alumbaugh.

In light of the above, Applicants submit that even if Moore and Alumbaugh were combined as asserted in the Office Action (even though there appears to be no motivation for such a combination), the resultant combination fails to teach the various features of claim 1. Accordingly, Applicants submit that claim 1, and the claims that depend therefrom, are allowable over a combination of Moore and Alumbaugh.

Applicants submit that independent claims 8 and 15 are patentable over Moore for at least a similar rationale as discussed above for claim 1. Applicants further submit that the dependent claims 9-10 and 12-14 that depend from claim 8, and claims 16-17 and 19-21 that depend from claim 15 are also not rendered obvious by Moore and Alumbaugh, either alone or in combination, for at least a similar rationale discussed above for the independent claims. Applicant submits that the dependent claims are patentable for additional reasons. It is therefore respectfully requested that the rejections of the pending claims be withdrawn.

III. Rejection under 35 USC § 103, Moore in view of Alumbaugh and in further view of Immberman

Claims 6, 13 and 20 were was rejected under 35 U.S.C. §103(a) as being unpatentable over Moore in view of Alumbaugh and in further view of Immberman et al. (US Patent 6,785,721) (hereinafter “Immberman”). Claims 6, 13, and 20 depend from independent claims 1, 8, and 15, respectively, which are not rendered obvious by Moore and Alumbaugh as discussed above. Accordingly, claims 6, 13 and 20 are also not rendered obvious by Moore and Alumbaugh for at least a similar rationale as discussed above for claims 1, 8, and 15.

Applicants further submit that Immerman does not make up for the deficiencies in Moore and Alumbaugh with respect to these claims. Immerman does not appear to teach anything about the use of two links to accomplish different functions– editing web pages through a first link (i.e., intranet link) and displaying the edited web pages through a second link (i.e., Internet), through the same web browser, as is recited by claim 1. Accordingly, Applicants submit that even if Moore, Alumbaugh, and Immerman were combined as suggested by the Office Action (even though there appears to be no motivation for the combination), the resultant combination would not make obvious the features recited in claims 6, 13 and 20. Applicants thus submit that claims 6, 13 and 20 are patentable over a combination of Moore, Alumbaugh, and Immerman.

IV. Rejection under 35 USC § 103, Moore in view of Alumbaugh and in further view of Dabney

Claims 7, 14 and 21 were was rejected under 35 U.S.C. §103(a) as being unpatentable over Moore in view of Alumbaugh and in further view of Dabney (US Patent 6,643,663) (hereinafter “Dabney”). Claims 7, 14 and 21 depend from independent claims 1, 8, and 15, respectively, which are not rendered obvious by Moore and Alumbaugh as discussed above. Accordingly, claims 7, 14 and 21 are also not rendered obvious by Moore and Alumbaugh for at least a similar rationale as discussed above for claims 1, 8, and 15.

Applicants further submit that Dabney does not make up for the deficiencies in Moore and Alumbaugh with respect to these claims. Dabney does not appear to teach anything about the use of two links to accomplish different functions– editing web pages through a first link (i.e., intranet link) and displaying the edited web pages through a second link (i.e., Internet), through the same web browser, as is recited by claim 1. Accordingly, Applicants submit that even if Moore, Alumbaugh, and Dabney were combined as suggested by the Office Action (even though there appears to be no motivation for the combination), the resultant combination would not make obvious the features recited in claims 7, 14 and 21. Applicants thus submit that claims 7, 14 and 21 are patentable over a combination of Moore, Alumbaugh, and Dabney.

V. Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

/ Naya M. Chatterjee-Marathe/

Naya M. Chatterjee-Marathe  
Reg. No. 54,680

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 650-326-2400  
Fax: 415-576-0300  
Attachments  
NMC:  
61764333 v1